

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

KEILEE FANT, ROELIF CARTER, ALLISON  
NELSON, HERBERT NELSON JR., ALFRED  
MORRIS, ANTHONY KIMBLE, DONYALE  
THOMAS, SHAMEIKA MORRIS, RONNIE  
TUCKER, JOHN NARAYAN, *et al.*,

Plaintiffs,

vs.

THE CITY OF FERGUSON,  
Defendant.

No. 4-15-CV-00253-AGF

(Class Action)

**DECLARATION OF ANGELA DAKER**  
**IN SUPPORT OF PLAINTIFFS' MOTION TO DISQUALIFY AND EXCLUDE THE**  
**TESTIMONY OF TONY WILKES**

1. My name is Angela Daker, and I am one of the attorneys for the Plaintiffs, Keilee Fant *et al.* I have personal knowledge of the facts stated in this declaration and if called as a witness could competently testify to their truth.

2. I submit this declaration in support of Plaintiffs' Motion to Disqualify and Exclude Testimony of Tony Wilkes.

3. Attached hereto as Exhibit 1 is a true and correct copy of Expert Report of Tony M. Wilkes, dated January 29, 2021.

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the Deposition of Expert Tony Wilkes, dated April 1, 2021.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the Deposition of Joseph Craig, dated February 18, 2020.

6. Attached hereto as Exhibit 4 is a true and correct copy of “Community Reentry Programs: Their Impacts on Offenders and Recidivism Rates,” National Institute of Corrections’ Large Jail Network Exchange, 2007 by Tony M. Wilkes.

7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the Deposition of Alfred Morris, dated April 19, 2017.

8. Attached hereto as Exhibit 6 is a true and correct copy of Bates Nos. City\_00228103–8112.

9. Attached hereto as Exhibit 7 is a true and correct copy of Bates Nos. City\_00609154, an email exchange between Dennis McBride and Craig Rettke, dated October 19, 2010.

10. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the Deposition of Roelif Carter, dated December 19, 2016.

11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the Deposition of Roelif Carter, dated March 3, 2017.

12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the Deposition of Ronnie Tucker, dated April 19, 2017.

13. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of the Deposition of Allison Nelson, dated December 19, 2016.

14. Attached hereto as Exhibit 12 is a true and correct copy of Bates No. City\_00184172, an email exchange between Richard Henke and William L. Ballard, dated August 3, 2012.

15. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the Deposition of Keilee J. Fant, dated March 3, 2017.

16. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of the Deposition William Catanzaro, dated May 3, 2016.

17. Attached hereto as Exhibit 15 is a true and correct copy of excerpts of the Deposition of Brian Kaminski, dated January 13, 2016.

18. Attached hereto as Exhibit 16 is a true and correct copy of excerpts of the Deposition of Daniel McDuffie, dated January 11, 2016.

19. Attached hereto as Exhibit 17 is a true and correct copy of an email exchange between David Haasenritter and Tony Wilkes, dated January 6, 2021.

Respectfully submitted,

By: /s/ Angela Daker  
Angela Daker (*pro hac vice*)  
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